

**510(k) SUMMARY**

**Simavita Pty Limited's SIM™ System**

**Submitter's Name, Address, Telephone Number, Contact Person  
and Date Prepared**

Simavita Pty Limited  
Level 6, 56 Berry Street  
North Sydney, NSW 2060  
Australia

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Contact Person: Peter Curran

Date Prepared: July 9, 2013

**AUG 22 2013**

**Name of Device and Name/Address of Sponsor**

Smart Incontinence Management (SIM™) System

Simavita Pty Limited  
Level 6, 56 Berry Street  
North Sydney, NSW 2060  
Australia

**Common or Usual Name**

Enuresis Alarm

**Classification Name**

Conditioned Response Enuresis Alarm; 21 C.F.R. 876.2040

**Predicate Devices**

Health Sense International, Inc.'s Remote A'Lert (K943559)

**Intended Use / Indications for Use**

SIM™ (Smart Incontinence Management) is indicated for use by healthcare professionals to remotely monitor wetness events, and collect, transmit and report wetness events and other medical information from multiple patients within a clinical setting (e.g., hospitals, skilled nursing facilities, residential care facilities), to establish effective management care plans for continence events.

### **Technological Characteristics**

SIM™ consists of disposable incontinence pads with embedded sensors, a wireless transceiver, hardware, and software.

### **Performance Data**

SIM™ was subjected to biocompatibility testing, electrical safety and electromagnetic safety testing, standard testing for electrical equipment intended for measurement purposes, safety testing for information technology equipment, and other relevant performance testing. In all instances, SIM™ functioned as intended and the results observed were as expected

### **Substantial Equivalence**

SIM™ is as safe and effective as the Remote A'Lert. SIM™ has the same intended use and similar indications, technological characteristics, and principles of operation as its predicate device. The minor technological differences between SIM™ and its predicate devices raise no new questions of safety or effectiveness. Thus, SIM™ is substantially equivalent.



DEPARTMENT OF HEALTH & HUMAN SERVICES

Public Health Service

Food and Drug Administration  
10903 New Hampshire Avenue  
Document Control Center – WO66-G609  
Silver Spring, MD 20993-0002

August 22, 2013

Simavita Pty Limited  
% John J. Smith, MD, JD  
Partner  
Hogan Lovells US LLP  
555 13<sup>th</sup> St. NW  
Washington, DC 20004

Re: K130951  
Trade Name: SIM™ System  
Classification Regulation Name and Number: 21 CFR§ 876.2040 – Enuresis alarm  
Regulatory Class: Class II Exempt  
Product Code: KPN  
Dated: July 9, 2013  
Received: July 9, 2013

Dear John J. Smith, MD, JD,

We have reviewed your premarket notification submission and have found this device to be exempt from the premarket notification requirements of the Federal Food, Drug, and Cosmetic Act (Act). Therefore, you may immediately begin marketing this device as described in your premarket notification.

The final classification regulation for your device appears in Title 21 of the Code of Federal Regulations (CFR) 876.2040 – Enuresis Alarm. Your device's classification regulation name, regulatory class and product code are shown above. When listing your device with the Food and Drug Administration, please use this product code.

In the future, new but substantially equivalent devices which fall within the above classification regulation name and meet the classification criteria may be marketed without sending a premarket notification submission to the Food and Drug Administration. We suggest, however, that you review 21 CFR Section 876.9 to determine whether or not your new device (s) meets the limitations of exemption from Section 510(k) of the Act.

If you have any questions regarding this letter, please contact Tuan Nguyen, Ph.D. at (301)796-5174. If you have procedural questions, please contact the Division of Small

Page 2 – John J. Smith, MD, JD

Manufacturers International and Consumer Assistance (DSMICA) at (301)796 7100 or at their toll free number (800)638 2041, or contact the 510k staff at (301)796 5640.

Sincerely yours,

**Herbert P. Lerner -S**

for

Benjamin R. Fisher, Ph.D.

Director

Division of Reproductive, Gastro-Renal,  
and Urological Devices

Office of Device Evaluation

Center for Devices and Radiological Health

Enclosure

### Indications for Use Statement

510(k) Number (if known):

Device Name: SIM™ System

Indications for Use: K130951

SIM™ (Smart Incontinence Management) is indicated for use by healthcare professionals to remotely monitor wetness events, and collect, transmit and report wetness events and other medical information from multiple patients within a clinical setting (e.g., hospitals, skilled nursing facilities, residential care facilities), to establish effective management care plans for continence events.

Prescription Use YES  
(Part 21 CFR 801 Subpart D)

AND/OR

Over-The-Counter Use No  
(21 CFR 801 Subpart C)

(PLEASE DO NOT WRITE BELOW THIS LINE-CONTINUE ON ANOTHER PAGE OF NEEDED)

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Concurrence of CDRH, Office of Device Evaluation (ODE)

**Herbert P. Lerner -S**

(Division Sign-Off)

Division of Reproductive, Gastro-Renal, and  
Urological Devices

510(k) Number K130951

Page 1 of 1